

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

WILLOW INNOVATIONS, INC.,

Plaintiff and Counterclaim Defendant,

v.

CHIARO TECHNOLOGY, LTD.,

Defendant and Counterclaim Plaintiff.

Case No. 2:23-cv-00229-JRG

**JOINT MOTION FOR EXTENSION OF TIME TO STAY ALL DEADLINES**

Plaintiff Willow Innovations, Inc. and Defendant Chiaro Technology Ltd. d/b/a Elvie (together, “the Parties”) respectfully request that this Court extend the stay previously entered (Dkt. 162) until April 4, 2025.

This extension is not requested to unduly delay this matter. The parties request this additional extension to finalize resolution of this matter. Additional information is provided in Confidential Exhibit 1. Counsel for Plaintiff and counsel for Defendant have conferred and agree on this motion.

WHEREFORE, the parties respectfully request that the Court extend the stay in this matter until April 4, 2025.

Respectfully submitted,

By: /s/ Timothy S. Durst

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Respectfully submitted,

By: /s/ Melissa R. Smith

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Plaintiff Chiaro Technology, Ltd.***

**CERTIFICATE OF CONFERENCE**

Counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and the parties jointly agree to the relief requested in this Motion.

/s/ Melissa R. Smith

Melissa R. Smith

**CERTIFICATE OF SERVICE**

I hereby certify that on March 5, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. All counsel of record who are deemed to have consented to electronic services are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3).

/s/ Melissa R. Smith

Melissa R. Smith